

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA**

GRADY O. HUMPHREYS, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION NO.
)	2:07CV607-WKW
vs.)	
)	
ASBESTOS DEFENDANTS:)	
)	
A.O. SMITH ELECTRICAL PRODUCTS)		
COMPANY, a division of A.O. SMITH)		
CORPORATION, et al.,)		
)	
Defendants.)	

DISCLOSURE STATEMENT OF DEFENDANT SQUARE D COMPANY
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 7.1(a)

NOW COMES SQUARE D COMPANY (“SQUARE D”) for itself and, to the extent necessary, on behalf of a purported party Defendant¹ incorrectly designated as "Schneider Electric Industries, S.A.S., North American Division" (a fictitious name that does not exist as an entity under the laws of any state or foreign jurisdiction), pursuant to Fed.R.Civ.P. 7.1, and to enable judges and magistrates of the Court to evaluate possible disqualification or recusal, the undersigned attorneys of record for the Defendant, SQUARE D COMPANY, certify that, based upon information and belief, the following is the ultimate parent company

¹The summons for “Schneider Electric Industries, S.A.S., North American Division” was served on Square D Company at its principal place of business in Palatine, Illinois. Although Square D Company is listed as a Defendant in this case, service of a summons addressed specifically to Square D Company has apparently not yet been attempted or made. Nonetheless, inasmuch as “Schneider Electric” is, among others, a brand name used by Square D Company and because “Schneider Electric Industries, S.A.S., North American Division” is not a legal entity capable of being sued, Square D Company hereby responds to this suit pursuant to Rules 8 and 9 of the *Federal Rules of Civil Procedure*; nonetheless, to the extent that it may ultimately be determined that this position misapprehends the circumstances or is otherwise in error based on law or on fact, all Rule 12 defenses are hereby specifically reserved.

of SQUARE D COMPANY and has issued shares of securities to the public: Schneider Electric, SA, incorporated under the laws of France, and traded on the Paris Stock Exchange.

Respectfully submitted,

s/Gary W. Fillingim

Edward B. McDonough, Jr. (MCDOE0149)

Gary W. Fillingim (FILLG1161)

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this case.

s/Gary W. Fillingim

Gary W. Fillingim